

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JEANYNA ESPINOSA, on behalf of
herself and all other similarly situated
consumers,

Plaintiff,

-against-

FORSTER & GARBUS, LLP; MIDLAND
FUNDING, LLC, AND ENCORE
CAPITAL GROUP, INC.,

Defendants.

Civil Action No:

1:16-cv-00464-MKB-RLM

**JOINT STIPULATION OF
DISMISSAL**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the parties hereby stipulate to dismissal of all claims of Plaintiff Jeanya Espinosa against Defendants Forster & Garbus, LLC, Midland Funding, LLC and Encore Capital Group, Inc. in the above-captioned matter, with prejudice as to Plaintiff's individual claims and without prejudice as to the class claims, and without costs.

Dated: June 15, 2016

Respectfully submitted,

ADAM J. FISHBEIN, P.C.

/s/ Adam J. Fishbein

Adam J. Fishbein, Esquire
483 Chestnut Street
Cedarhurst, NY 11516
(516) 791-4400
fishbeinadamj@gmail.com
Attorney for Plaintiff

MARSHALL DENNEHEY WARNER
COLEMAN AND GOGGIN, PC

/s/ Matthew B. Johnson

Matthew B. Johnson
Wall Street Plaza
88 Pine St, 21st Fl
New York, NY 10005
Tel: 212.376.6433
MBJohnson@mdwgc.com
*Attorney for Midland Funding, LLC and
Encore Capital Group, Inc.*

ROBERT L. ARLEO, ESQ. P.C.

/s/ Robert L. Arleo

Robert L. Arleo
380 Lexington Avenue, 17th Fl.
New York, NY 10168
Tel: 212.551.1115
robertarleo@gmail.com
Attorney for Forster & Garbus, LLP